

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
MARITIME COMMUNICATIONS/LAND)	EB Docket No. 11-71
MOBILE, LLC)	File No. EB-09-IH-1751
)	FRN: 0013587779
Participant in Auction No. 61 and Licensee of Various)	
Authorizations in the Wireless Radio Services)	
Applicant for Modification of Various Authorizations)	
in the Wireless Radio Services;)	
)	
Applicant with ENCANA OIL AND GAS (USA), INC.;)	Application File Nos.
DUQUESNE LIGHT COMPANY; DCP)	0004030479, 0004144435,
MIDSTREAM, LP; JACKSON COUNTY RURAL)	0004193028, 0004193328,
MEMBERSHIP ELECTRIC COOPERATIVE; PUGET)	0004354053, 0004309872,
SOUND ENERGY, INC.; ENBRIDGE ENERGY)	0004310060, 0004314903,
COMPANY, INC.; INTERSTATE POWER AND)	0004315013, 0004430505,
LIGHT COMPANY; WISCONSIN POWER AND)	0004417199, 0004419431,
LIGHT COMPANY; DIXIE ELECTRIC)	0004422320, 0004422329,
MEMBERSHIP CORPORATION, INC.; ATLAS)	0004507921, 0004153701,
PIPELINE—MID CONTINENT, LLC; DENTON)	0004526264, 0004636537,
COUNTY ELECTRIC COOPERATIVE, INC., DBA)	and 0004604962
COSERV ELECTRIC; AND SOUTHERN)	
CALIFORNIA REGIONAL RAIL AUTHORITY)	
)	
For Commission Consent to the Assignment of Various)	
Authorizations in the Wireless Radio Services)	

To: Marlene H. Dortch, Secretary

Attn: The Honorable Richard L. Sippel, Chief Administrative Law Judge

DRAFT GLOSSARY PER ORDER, FCC 12M-39

Maritime Communications/Land Mobile, LLC (Maritime), in response to the Presiding Judge's *Order* (FCC 12M-39; released August 7, 2012), hereby tenders a draft glossary of terms relating to Issue G in this proceeding.

In accordance with the *Order*, Maritime invited input from counsel for Pinnacle Wireless and from Mr. Robert H. Jackson, Esq., counsel for at least a portion of the Havens entities.

Neither Mr. Havens nor any of the Havens (or so-called "SkyTel" entities) offered any

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substantive input beyond and initial email communication from Mr. Havens.¹ Over the course a three days (from the morning of August 14 through this afternoon, August 16), Maritime circulated revised drafts to all of the parties, considered and discussed suggestions and comments, finally arriving at the attached document. In this process, Maritime considered and adopted several changes proposed by the Enforcement Bureau. It is clear, however, that Maritime and the Enforcement Bureau are still in disagreement on a few key terms and concepts. It is Maritime's understanding that the Bureau will be filing some objections in accordance with the procedures set forth in the *Order*.

The Commission's regulations and policies regarding mobile radio communications in general, and AMTS in particular, can be arcane and difficult to understand when one does not deal with them on a regular basis. Maritime therefore thanks the Presiding Judge for this opportunity to shed some light on the rules and terminology relevant to this case. It is Maritime's hope and intention that this glossary will prove useful to the Presiding Judge.

Respectfully Submitted,



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Dated: August 16, 2012

¹ Undersigned counsel advised Mr. Jackson at the outset (i.e., on August 8, 2012) that he would not deal directly with Mr. Havens on this matter for at least three reasons: (1) Mr. Havens's failure to comply with the presiding judge's prior rulings regarding retention of and acting through licensed legal counsel in this matter, (2) ethical concerns about legal counsel dealing directly with a party or the principals of a party except through legal counsel, and (3) the fact that Mr. Havens had repeatedly threatened to bring "sanctions" against undersigned counsel. Maritime nonetheless used its best efforts to accommodate an internal deadline proposed by Mr. Havens for circulating a first draft, and also gave consideration to some initial suggestions of Mr. Havens, and communicated to Mr. Jackson the reasons why those suggestions were not being incorporated.

AMTS GLOSSARY

(per Order, FCC 12M-39; rel. Aug. 7, 2012, in EB Docket No. 11-71)

The following definitions are intended to be used solely for purposes of the hearing in EB Docket No. 11-71. They are not intended to and do not in any manner whatsoever modify, revise, amend, supplement, or explain any existing definition used in any Commission rule, order, document, or other proceeding.

AMTS

AMTS is an acronym for Automated Maritime Telecommunications System. AMTS was originally called Inland Waterways Communications System (“IWCS”). See *Automated Inland Waterways Communications System*, Gen Docket No. 80-1, Report and Order, 84 FCC 2d 875 (1981). This was initially structured as a service providing vessels with access to the public switched telephone network over a greater length of inland waterways (rivers or lakes) than could be served by a traditional VHF public coast station. Since 2007, the Commission’s Rules have permitted service to mobile units on land and have not required AMTS facilities to be interconnected. *E.g., Maritel, Inc. and Mobex Network Services, LLC*, 22 FCC Rcd 8971, 8976-9877 (2007).

AMTS Area (“AMTSA”)

An AMTS Area (“AMTSA”) is a market area in which a geographic licensee is authorized to operate on a particular frequency block (A or B). There are ten (10) AMTSAs, each comprised of one or more Economic Areas (“EAs”) or EA-like areas. (Each EA is, in turn, comprised of one or more counties or similar areas.) The EAs making up each specific AMTSA are set forth in a table in Appendix D of the applicable rulemaking order, *Amendment of the Commission's Rules Concerning Maritime Communications*, PR Docket No. 92-257, *Second Memorandum Opinion and Order and Fifth Report and Order*, 17 FCC Rcd 6685, 6738, *Appendix D* (2002). The table that is codified at 47 C.F.R. § 80.385(a)(3) contains formatting problems causing some of the data to be inserted incorrectly. A copy of the correct table, as published at 67 Fed. Reg. 48,560 (July 25, 2002), is attached to this glossary.

AMTS License

An AMTS license is one authorizing the operation of an AMTS station, either on frequencies specified in 47 C.F.R. § 80.385(a)(2) of the Commission’s Rules or utilizing any modulation or channelization scheme in accord with 47 C.F.R. § 80.481.

Automated Maritime Telecommunications System

Defined in 47 C.F.R. § 80.5 of the FCC rules as “[a]n automatic maritime communications system.” See *AMTS*.

Block A and/or Block B

See *Frequency Block*.

Construction Deadline or Period

The period of time after initial licensing within which an AMTS station must be constructed. The rules require an incumbent AMTS station to be constructed and placed into operation within two years of initial authorization. 47 C.F.R. § 80.49(a)(3). The rule previously specified an eight month initial construction period, but it was amended to the current two year period in 2000. *Amendment of the Commission's Rules Concerning Maritime Communications*, PR Docket No. 92-257, *Fourth Report and Order and Third Further Notice of Proposed Rule Making*, 15 FCC Rcd 22585, 22596 ¶17 (2000). Section 80.49(a)(3) further provides that an “AMTS ... geographic area licensee must make a showing of substantial service within its service area within ten years of the initial license grant ‘Substantial’ service is defined as service which is sound, favorable, and substantially above a level of mediocre service which just might minimally warrant renewal.” 47 C.F.R. § 80.49(a)(3).

Constructed

An incumbent AMTS station is deemed to be constructed if all the necessary equipment is in place and the station has been built in substantial compliance with the terms of the then-current authorization.

Deleted

A deleted facility, for purposes of this proceeding, refers to the deletion of an authorized location and/or frequency block from an AMTS authorization. An incumbent AMTS authorization may specify multiple locations and/or frequency blocks. From time to time some portion of these parameters may be deleted from the license without affecting the continued validity of the remaining parts of the authorization. This may happen by Commission order, e.g., if the Commission determines that a particular location/frequency block combination is no longer valid, or voluntarily by the licensee where it has decided to no longer retain a portion of its authorization.

Maritime recently decided to delete from its incumbent licenses authority for those facilities that are now subsumed within a geographic license Maritime obtained in FCC Spectrum Auction No. 61. If an entire incumbent call sign was subsumed, Maritime simply canceled the entire authorization. Where only some, but not all, of the authorized locations or frequency blocks on an authorization was subsumed, Maritime submitted an application to delete the subsumed portion, and retained the rest of the authorization.

Finally, with respect to Call Sign WRV374, Maritime is not able to submit applications to delete locations at this time due to ULS restrictions. The expiration date for WRV374 has passed and a timely filed renewal application is pending before the Commission. The ULS does not permit the modification (including partial deletions) of a license after its expiration date until the license is renewed. Maritime nevertheless stipulated that the subsumed locations will be deleted and that it is no longer defending these locations as to Issue G.

See also *Geographic License* and *Subsumed or Subsuming License*.

Fill-In Transmitter

An incumbent licensee is authorized to establish one or more “fill-in transmitters” within the footprint of the transmitter specified in the authorization. Additional Commission authorization is not required provided that the predicted interference contours of fill-in transmitters do not encompass any land area beyond the composite interference contour of the licensed AMTS system. See, e.g., *Amendment of the Commission's Rules Concerning Maritime Communications*, PR Docket No. 92-257, *Fourth Report and Order and Third Further Notice of Proposed Rule Making*, 15 FCC Rcd 22585, 22593 (2000); *Second Memorandum Opinion and Order and Fifth Report and Order*, 17 FCC Rcd 6685, 6705 (2002). Fill-in transmitters make a more efficient use of spectrum by facilitating frequency re-use, or “cellularizing” of high site systems. They are also useful for overcoming terrain blockage, providing improved signal strength to a particular location, etc. A spectrum lessee may construct and operate its own fill-in transmitters provided their resulting interference contours do not exceed the lessor/licensee’s authorized composite interference contour. See also *Footprint* and *Spectrum Lease*.

Footprint

The “footprint” of an incumbent AMTS facility refers to a theoretically predicted contour area around the licensed transmitter location. Depending on the circumstances, this may refer to the calculated service area contour (a 38 dB μ contour) or the interference contour (a 20 dB μ contour), the latter being derived from the required 18 dB desired-to-undesired signal ratio required between co-channel stations.

Frequency Block

Insofar as relevant to this proceeding, the FCC defined two AMTS frequency blocks, each consisting of two paired 500 kHz spectrum segments, for a total of one MHz each, as follows:

Block A: 217.5–218.0 & 219.5–220.0 MHz

Block B: 217.0–217.5 & 219.0–219.5 MHz

Licensees have flexibility and discretion regarding how to channelize their authorized spectrum block.

Geographic License

An AMTS geographic license (as distinguished from an incumbent or site-based license) authorizes the licensee to use a specific frequency block (Block A or Block B) throughout one of ten defined geographic regions called AMTS Areas, subject to the obligation to protect incumbent (that is, site-based) licensees from co-channel interference. Geographic licenses are awarded via competitive bidding procedures, and are therefore also sometimes referred to as “auctioned” licenses. The geographic licensee may locate its facilities anywhere within its authorized area, provided that the resulting 38 dB μ contour does not extend beyond the AMTSA boundary and co-channel incumbent licensees are protected. 47 C.F.R. § 80.479(b). See *AMTSA* and *Incumbent (or site-based) Licensee*.

Incumbent (or site-based) License

An incumbent AMTS license is one granted prior to the implementation of geographic licensing and the auctioning of geographic licenses. Insofar as relevant to this proceeding, an incumbent license authorizes operation of a fixed transmitter at a specific location indicated on the license. An incumbent licensee is authorized to establish one or more “fill-in transmitters” within the 38 dBμ contour footprint of the transmitter specified in authorization. *See* 47 C.F.R. § 80.385(b)(1). A geographic licensee must protect against co-channel interference to any incumbent station having a 38 dBμ contour within the applicable AMTSA. The incumbent license is thus an encumbrance or limitation on the geographic license. Should the incumbent license terminate for any reason, however, the area within the 38 dBμ contour devolves to the geographic licensee and is no longer an encumbrance on its geographic license. 47 C.F.R. § 80.385(c).

Known (or Not Known) to be Operating (or Not Operating), Operational

Although not officially defined by the Commission in its regulations or otherwise, these or similar terms have been used by Maritime in its discovery responses to convey, as a factual matter, the status of its incumbent facilities. Maritime has designated a facility as operational only if it knows or has a reasonable basis for believing that it is currently operational. Similarly, Maritime has designated a facility as non-operational or temporarily suspended if it knows that the facility is not currently operational. Finally, where Maritime does not know the current status of a facility, it has candidly so stated. *See also Constructed and Operating or Operational.*

Lease

In the AMTS licensing context, the term “lease” may refer to either a *Site Lease* or a *Spectrum Lease*. For example, a site lease is where Maritime leases space from a tower company (e.g., American Tower or Crown Castle), while a spectrum lease is where a third party (e.g., Pinnacle Wireless or Evergreen School District) leases the use of spectrum licensed to Maritime. These are two different things, and there is a separate entry for each in this glossary.

Not Operating (including Temporarily and Permanently Not Operating)

An AMTS facility is not operating for regulatory purposes if it is not capable of exchanging two way communications traffic with a ship or mobile station. A facility is *Temporarily Not Operating* if it is not currently operating but the licensee intends to resume operation. A facility is *Permanently Not Operating* if it is not currently operating and the licensee does not intend to resume operation. *See also Operating or Operational and Permanent Discontinuance.*

Operating or Operational

An AMTS facility is operating for regulatory purposes if it is constructed and operational, i.e., capable of exchanging two way communications traffic with a ship or mobile station. Unlike certain other radio services (*see, e.g., 47 C.F.R. § 90.155(c)*), the Commission’s rules do not

require that an incumbent AMTS service actually be providing service to any minimum number of units to be deemed to be constructed and in operation. See also *Constructed*.

Permanent Discontinuance

Section 1.955(a)(3) of the FCC Rules provides in pertinent part: “Authorizations automatically terminate, without specific Commission action, if service is permanently discontinued. The Commission authorization or the individual service rules govern the definition of permanent discontinuance for purposes of this section.” 47 C.F.R. § 1.955(a)(3). There is no AMTS regulation defining permanent discontinuance. The Commission has proposed to adopt—but has not yet done so—an objective definition of permanent discontinuance for AMTS stations, *Amendment of Parts 1, 22, 24, 27, 74, 80, 90, 95, and 101 To Establish Uniform License Renewal, Discontinuance of Operation, and Geographic Partitioning and Spectrum Disaggregation Rules and Policies for Certain Wireless Radio Services*, WT Docket No. 10-112, *Notice of Proposed Rulemaking and Order*, 25 FCC Rcd 6996 (2010), but no such rule has yet been promulgated. The Commission explained that, precisely “[b]ecause an authorization will ‘automatically terminate’ ... it is imperative that our rules provide a clear and consistent definition of permanent discontinuance of operations; they do not.” Accordingly, Wireless Telecommunications Bureau’s Mobility Division, acting for the Commission pursuant to delegated authority, has determined that, until an objective definition is adopted, “it would be inappropriate to, retroactively and without notice, apply [an objective definition] to Part 80 stations” and that it therefore must “evaluate claims of permanent discontinuance on a case-by-case basis.” *Northeast Utilities Service Co.*, 24 FCC Rcd 3310, 3314 (WTB MSD 2009).¹

Site Lease

A site lease is a typical real estate contractual arrangement whereby the transmitter site, tower or tower space, and/or building or rack space required for the AMTS licensee’s installation is leased from a third party. This is to be distinguished from a Spectrum Lease, the latter being a regulatory construct, not a real estate contract. See also *Lease* and *Spectrum Lease*.

Spectrum Lease

In lieu of providing a communications service to end user mobile units by means of radio facilities, an AMTS licensee may lease the use of some or all of its authorized spectrum within some or all of its authorized service area to a third party. See, generally, *Principles for Promoting the Efficient Use of Spectrum by Encouraging the Development of Secondary Markets*, WT Docket No. 00-230, *Policy Statement*, 15 FCC Rcd 24178 (2000); *Report and*

¹ This is consistent with, and indeed required by, the legal and Constitutional principles enunciated in the Supreme Court’s recent opinion in *FCC v. Fox Television Stations*, 132 S. Ct. 2307 (2012). The Court there explained: “A fundamental principle in our legal system is that laws which regulate persons or entities must give fair notice of conduct that is forbidden or required. ... First, ... regulated parties should know what is required of them so they may act accordingly; second, precision and guidance are necessary so that those enforcing the law do not act in an arbitrary or discriminatory way.” 132 S. Ct. 2317 (citations omitted).

Order and Further Notice of Proposed Rulemaking, 18 FCC Rcd 20604 (2003); *Second Report and Order, Order on Reconsideration, and Second Further Notice of Proposed Rulemaking*, 19 FCC Rcd 17503 (2004). At the end of the lease term, or if the spectrum lease terminates or ends for any reason, the rights to the spectrum and geographic area under lease revert to the lessor/licensee. See also *Lease* and *Site Lease*.

Subsumed or Subsuming License

As used by Maritime in this proceeding, these terms refer to the following circumstance. If the same entity holds both a geographic license and an incumbent license on the same frequency block, and where the 38 dB μ contour for the incumbent station lies entirely within the geographic license's AMTSA or AMTSAs, the geographic authorization (the subsuming license) entirely duplicates the authority granted by the incumbent authorization (the subsumed license) rendering the latter unnecessary. The spectrum and geographic area freed when an incumbent license is terminated devolves to the holder of the geographic licensee for the AMTSA in which the terminated incumbent station lies. 47 C.F.R § 80.385(c). In the situation described, both the incumbent licensee and the geographic licensee are the same entity, so the termination results in no net gain or loss of authority for that entity. See also *AMTS Area*, *Frequency Block*, *Geographic License*, and *Incumbent (or site-based) License*.

³ Ship transmit frequencies in Groups A and B are permitted to provide mobile-to-mobile communications where the written consent of all affected licensees is obtained.

(3) As listed in the table in this paragraph, AMTS Areas (AMTSAs) are based on, and composed of one or more of, the U.S. Department of Commerce's 172 Economic Areas (EAs). See 60 FR 13114 (March 10, 1995). In addition, the Commission shall treat Puerto Rico, the United States Virgin Islands, and the

Gulf of Mexico as EA-like areas. Maps of the EAs and AMTSAs are available for public inspection and copying at the Federal Communications Commission, Public Safety and Private Wireless Division, 445 12th Street, SW., Room 4-C330, Washington, DC. The Group A and B frequency pairs listed in the table

in paragraph (a)(2) of this section are available for assignment to a single licensee in each of the AMTSAs listed in the table in this paragraph. In addition to the listed EAs listed in the table in this paragraph, each AMTSA also includes the adjacent waters under the jurisdiction of the United States.

AMTS AREAS (AMTSAs)

AMTSAs	EAs
1 (Northern Atlantic)	1-5, 10.
2 (Mid-Atlantic)	9, 11-23, 25, 42, 46.
3 (Southern Atlantic)	24, 26-34, 37, 38, 40, 41, 174.
4 (Mississippi River)	35, 36, 39, 43-45, 47-53, 67-107, 113, 116-120, 122-125, 127, 130-134, 176.
5 (Great Lakes)	6-8, 54-66, 108, 109.
6 (Southern Pacific)	160-165.
7 (Northern Pacific)	147, 166-170.
8 (Hawaii)	172.
9 (Alaska)	171.
10 (Mountain)	110-112, 114-115, 121, 126, 128, 129, 135-146, 148-159.

* * * * *

(b) Subject to the requirements of § 1.924 of this chapter, §§ 80.215(h), and 80.475(a), each AMTS geographic area licensee may place stations anywhere within its region without obtaining prior Commission approval provided:

(1) The AMTS geographic area licensee must locate its stations at least 120 kilometers from the stations of co-channel site-based AMTS licensees. Shorter separations between such stations will be considered by the Commission on a case-by-case basis upon submission of a technical analysis indicating that at least 10 dB protection will be provided to an site-based licensee's predicted 38 dBu signal level contour. The site-based licensee's predicted 38 dBu signal level contour shall be calculated using the F(50, 50) field strength chart for Channels 7 through 13 in § 73.699 (Fig. 10) of this chapter, with a 9 dB correction for antenna height differential. The 10 dB protection to the site-based licensee's predicted 38 dBu signal level contour shall be calculated using the F(50, 10) field strength chart for Channels 7-13 in § 73.699 (Fig. 10a) of this chapter, with a 9 dB correction factor for antenna height differential.

(2) The locations and/or technical parameters of the transmitters are such that individual coordination of the channel assignment(s) with a foreign administration, under applicable international agreements and rules in this part, is not required.

(3) For any construction or alteration that would exceed the requirements of

§ 17.7 of this chapter, licensees must notify the appropriate Regional Office of the Federal Aviation Administration (FAA Form 7460-1) and file a request for antenna height clearance and obstruction marking and lighting specifications (FCC Form 854) with the FCC, Attn: Information Processing Branch, 1270 Fairfield Rd., Gettysburg, PA 17325-7245.

(4) The transmitters must not have a significant environmental effect as defined by §§ 1.1301 through 1.1319 of this chapter.

(c) Any recovered frequency blocks will revert automatically to the holder of the geographic area license within which such frequencies are included. Any frequency blocks recovered where there is no geographic area licensee will be retained by the Commission for future licensing.

* * * * *

15. Section 80.475 is amended by revising paragraph (a) to read as follows:

§ 80.475 Scope of service of the Automated Maritime Telecommunications System (AMTS).

(a) A separate Form 601 is not required for each coast station in a system. However, except as provided in § 80.385(b) and paragraph (b) of this section, the applicant must provide the technical characteristics for each proposed coast station, including transmitter type, operating frequencies, emissions, transmitter output power, antenna arrangement, and location.

* * * * *

16. Section 80.479 is revising paragraph (a) and adding paragraphs (b) and (c) to read as follows:

§ 80.479 Assignment and use of frequencies for AMTS.

(a) The frequencies assignable to AMTS stations are listed in subpart H of this part. These frequencies are assignable to ship and public coast stations for public correspondence communications.

(b) The transmissions from a station of an AMTS geographic area licensee may not exceed a predicted 38 dBu field strength at the geographic area border, unless all affected co-channel geographic area licensees agree to the higher field strength. The predicted 38 dBu field strength is calculated using the F(50, 50) field strength chart for Channels 7 through 13 in § 73.699 (Fig. 10) of this chapter, with a 9 dB correction factor for antenna height differential. Geographic area licensees must coordinate to minimize interference at or near their geographic area borders, and must cooperate to resolve any instances of interference in accordance with the provisions of § 80.70(a).

(c) AMTS frequencies may be used for mobile-to-mobile communications if written consent is obtained from all affected licensees.

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CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of August, 2012, I caused copies of the foregoing pleading to be served, by U.S. Postal Service, First Class postage prepaid, on the following:

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